



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 16, 2022

Allen Shellfish, LLC  
Attn: Brian Allen  
PO Box 11775  
Bainbridge Island, WA 98110

Re: Coastal Zone Consistency for Corps Reference No. **200701383**,  
Johnson Lease, Thurston County, Washington

Dear Brian Allen:

On February 10, 2022, the Department of Ecology received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project.

This determination is for commercial shellfish aquaculture farm that cultivates geoduck clams on approximately 0.25 acres of privately-owned tidelands between approximately +2.0ft and -4.5ft Mean Lower Low Water elevation contours. There is no eelgrass present at this site. The site is maintained through site visits to ensure that gear is in place. Regular access is via boat; no regular upland access.

Planting occurs when juvenile geoduck seed are placed in flexible high-density polyethylene (HDPE) mesh sleeves (4 x 13 inches) which are pushed into the substrate to a depth of 6-7 inches (leaving 6-7 inches emergent) by using low-pressure pumped seawater that prepares the substrate for installation. The top of the mesh tube is left open. The mesh sleeves stay in for about 30 months before the removal process begins (or about 1/2 the culture period).

The mesh sleeves are UV-stable; designed and manufactured for marine application. Typically, mesh sleeves are installed at a density of one tube per 1-1.3 square feet and planted with 3-4 seed clams in each tube. The mesh sleeves are removed once the geoducks are large enough and they are left to grow unprotected until harvest (2-5 years). Polyvinyl chloride (or PVC) tubes and predator exclusion nets are not used.

Geoduck clams are harvested using either dry (i.e., during low tide exposure) or wet (i.e., diving) harvest methods. Dive harvest is the majority harvest activity. Market size

clams are harvested individually using a low-pressure water pump. Once harvested, a new crop is planted and the aforementioned process is repeated. Total growing time is approximately 4-7 years.

The project site is located on tidelands within Nisqually Reach, on parcel number 44900002802, adjacent to 6101 88th Avenue NE, near Olympia, Thurston County, Washington; Section 3, Township 19 North, Range 1 West; WRIA 13, Deschutes Watershed.

Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Allen Shellfish, LLC's determination that the proposed work is consistent with Washington's CZMP.

If you have any questions regarding Ecology's consistency determination, please contact Teresa Pucylowski at [teressa.pucylowski@ecy.wa.gov](mailto:teressa.pucylowski@ecy.wa.gov).

#### **YOUR RIGHT TO APPEAL**

You have a right to appeal this decision to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this decision. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this decision:

- File your appeal and a copy of this decision with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this decision on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Address and location information

**Filing an appeal with the PCHB:**

**Mailing Address:**

Pollution Control Hearings Board  
PO Box 40903  
Olympia, WA 98504-0903

**Street Address:**

Pollution Control Hearings Board  
1111 Israel RD SW  
STE 301  
Tumwater, WA 98501

**Serving a copy of the appeal on Ecology:**

**Mailing Address:**

Department of Ecology  
Attn: Appeals Processing Desk  
PO Box 47608  
Olympia, WA 98504-7608

**Street Address:**

Department of Ecology  
Attn: Appeals Processing Desk  
300 Desmond Drive SE  
Lacey, WA 98503

Sincerely,



Brenden McFarland, Section Manager  
Environmental Review and Transportation Section  
Shorelands and Environmental Assistance Program

E-cc: Aquaculture-Reinforcement-Team@usace.army.mil  
Chelsea Fannin, U.S. Army Corps of Engineers  
Teresa Pucylowski, Ecology  
Loreé Randall, Ecology  
ecyrefedpermits@ecy.wa.gov